

IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

In re:	§	Chapter 11
	§	
ERG Intermediate Holdings, LLC, <i>et al.</i> ¹	§	Case No. 15-31858
	§	
Debtor.	§	

**NOTICE OF APPEARANCE UNDER BANKRUPTCY
RULE 9010(b) COMBINED WITH REQUEST FOR ALL COPIES
PURSUANT TO BANKRUPTCY RULE 2002
AND PLEADINGS PURSUANT TO BANKRUPTCY RULE 3017(a)**

TO THE HONORABLE UNITED STATES BANKRUPTCY COURT:

Parex Resources, Inc. (“Parex”), Parex Resources (Bermuda), Ltd. (“Parex Bermuda”) and Ramshorn International Limited (“Ramshorn”) parties in interest in the above-captioned bankruptcy case, request that all notices given or required to be given and all papers served or required to be served by U. S. Mail **and** by email in the above-captioned case be given to and served upon:

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¹ The Debtors in these cases, along with the last four digits of each Debtor’s federal tax identification number, are ERG Intermediate Holdings, LLC (2521); ERG Resources, L.L.C. (0408); West Cat Canyon, L.L.C. (7377); ERG Interests, LLC (2081); and ERG Operating Company, LLC (7946). ERG Intermediate Holdings, LLC is the direct or indirect parent of each of its affiliated Debtors. The mailing address for each of the Debtors, with the exception of ERG Operating Company, LLC, is 333 Clay Street Suite 4400, Houston, TX 77002. The mailing address for ERG Operating Company, LLC is 4900 California Avenue Suite 300B, Bakersfield, CA 93309. The above addresses are listed solely for the purposes of notices and communications.

This request encompasses all notices, copies and pleadings referred to in section 1109(b) of Title 11, United States Code or in Rules 2002, 3017 or 9007 of the Bankruptcy Rules of Procedure, including, without limitation, notices of any orders, motions, demands, complaints, petitions, pleadings, plans of reorganization, disclosure statements, requests, or applications, and any other documents brought before this Court in this case, whether formal or informal, written or oral, or transmitted or conveyed by mail, delivery, telephone, telex or otherwise which affect or seek to affect the above case.

This Notice of Appearance and Request for Notices shall not be deemed or construed to be a waiver of rights of Parex, Parex Bermuda and Ramshorn (i) to have final orders in noncore matters only after de novo review by a district judge, (ii) to trial by jury in any proceedings so triable in these cases or in any case, controversy, or proceeding related to these cases, (iii) to have a District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (iv) to any rights, claims, actions, setoffs, or recoupments to which Parex, Parex Bermuda and Ramshorn is or may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved.

Respectfully submitted this 18th day of May 2015.

/s/Joshua W. Wolfshohl

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**Attorneys for Parex Resources,
Inc., Parex Resources (Bermuda),
Ltd. and Ramshorn International
Limited**

CERTIFICATE OF SERVICE

This will certify that a true and correct copy of the foregoing document was forwarded by electronic transmission to all registered ECF users appearing in the case on May 18, 2015.

/s/ Joshua W. Wolfshohl

Joshua W. Wolfshohl